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*Fair Maps Nevada PAC, Sondra Cosgrove,*  
*Douglas Goodman, and Robert MacDonald*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

FAIR MAPS NEVADA, a Nevada political  
action committee, SONDRA COSGROVE,  
DOUGLAS GOODMAN, and ROBERT  
MACDONALD,

Plaintiffs,

v.

BARBARA CEGAVSKE, in her official  
capacity as Nevada Secretary of State,  
JOSEPH P. GLORIA, in his official capacity  
as Clark County Registrar of Voters, DEANNE  
SPIKULA, in her official capacity as Washoe  
County Registrar of Voters, KRISTINA  
JAKEMAN, in her official capacity as Elko  
County Clerk, SADIE SULLIVAN, in her  
official capacity as Lander County Clerk,  
LACEY DONALDSON, in her official  
capacity as Pershing County Clerk-Treasurer,  
VANESSA STEVENS, in her official capacity  
as Storey County Clerk-Treasurer, NICHOLE  
BALDWIN, in her official capacity as White  
Pine County Clerk, SANDRA MERLINO, in  
her official capacity as Nye County Clerk,  
TAMMI RAE SPERO, in her official capacity  
as Humboldt County Clerk, KATHY LEWIS,  
in her official capacity as Douglas County  
Clerk-Treasurer, LINDA ROTHERY, in her  
official capacity as Churchill County Clerk-  
Treasurer, LACINDA ELGAN, in her official  
capacity as Esmeralda County Clerk-Treasurer,  
LISA C. LLOYD, in her official capacity as  
Lincoln County Clerk, LISA HOEHNE, in her  
official capacity as Eureka County Clerk,  
CHRISTOPHER NEPPER, in his official

Case No.: 3:20-cv-00271-MMD-WGC

**JOINT MOTION TO APPROVE CONSENT  
DECREE**

capacity as Mineral County Clerk-Treasurer, NIKKI BRYAN, in her official capacity as Lyon County Clerk-Treasurer, and AUBREY ROWLATT, in her official capacity as Carson City Clerk-Recorder,

Defendants.

Plaintiffs Fair Maps Nevada, Sondra Cosgrove, Douglas Goodman and Robert MacDonald, by and through their undersigned counsel, and Defendants Secretary of State Barbara Cegavske, Clark County Registrar of Voters Joseph P. Gloria, Washoe County Registrar of Voters Deanna Spikula, Elko County Clerk Kristina Jakeman, Lander County Clerk Sadie Sullivan, Pershing County Clerk-Treasurer Lacey Donaldson, Storey County Clerk Vanessa Stevens, White Pine County Clerk Nichole Baldwin, Nye County Clerk Sandra Merlino, Humboldt County Clerk Tammie Rae Spero, Douglas County Clerk-Treasurer Kathy Lewis, Churchill County Clerk-Treasurer Linda Rothery, Esmeralda County Clerk-Treasurer Lacinda Elgan, Lincoln County Clerk Lisa C. Lloyd, Eureka County Clerk Lisa Hoehne, Mineral County Clerk-Treasurer Christopher Nepper, Lyon County Clerk-Treasurer Nikki Bryan and Carson City Clerk-Recorder Aubrey Rowlatt (“Defendants”) submit this Joint Motion to Approve Consent Decree (“Motion”). Intervenor Rev. Leonard Jackson and Nevada Resort Association PAC (“Intervenors”) have not joined this Motion.

On May 20, 2020, the Court granted in part and denied in part Plaintiffs’ Motion for Preliminary Injunction (ECF 2), concluding that NRS 295.056(3) is unconstitutional as applied to Plaintiffs. (ECF 44, Order at 32-33.) In the Order, the Court indicated that the “parties can work out a reasonable accommodation” to ensure Plaintiffs’ constitutional rights are preserved. (*Id.* at 28, n. 20.) Following issuance of the Order, Plaintiffs and Defendants conferred and reached agreement on such an accommodation. The terms of the accommodation are reflected in the attached Consent Decree (Exhibit A).

Plaintiffs and Defendants jointly request that the Court approve the attached Consent Decree. The terms of the Consent Decree are in the best interests of justice in light of the constitutional issues at stake in the instant litigation. Expedient entry of this Consent Decree

1 avoids continued litigation and concomitant uncertainty around the November election.  
2 Accordingly, Plaintiffs and Defendants ask this Court to grant the Motion and approve the Consent  
3 Decree.

4  
5 Dated: June 9, 2020

6 FOR DEFENDANTS:

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